



## COUNTY OF NEVADA COMMUNITY DEVELOPMENT AGENCY

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May 19, 2006

Mr. Robert Schneider  
Chair, Central Valley Regional Water Quality Control Board  
11020 Sun center Drive # 200  
Rancho Cordova, Ca 95670

Dear Mr.Schneider,

Thank you for this opportunity to comment on proposed changes to the Irrigated Lands Program. I was delighted to see that my point that this program is intended for commercial agricultural operations was included in the language proposed by paragraph 45. Nevada County believes that this addresses who should be in the program and who is not required to be in.

With the current language, agricultural residents of the foothills are having a difficult time accepting the current Regional Board's Agricultural Discharge Waiver Program. All irrigated agricultural land in the western portion of Nevada County accounts for only 30,000 acres out of 450,000. This number includes a majority of people who do not sell a crop. Irrigated lands also provide firebreaks and in foothill counties, where wildfire is considered one of the greatest threats to life, property and natural resources, irrigated pasture and croplands are considered valuable allies.

I would also request that a DeMinimus waiver be granted for foothill areas where pesticide use by irrigated agriculture as documented by the California Department of Pesticide Regulation annual Pesticide Use Report for chemicals used in a county is less than 60,000 lbs a year and the irrigated lands are less than 10% of the land area. IN these areas, irrigated pastures and cropland pose little threat from the standpoint of pesticides and most are managed to minimize or eliminate any irrigation runoff. In storm events, these pastures and croplands produce less sediment than lands that are not irrigated because those areas are less likely to be covered with vegetation.

We cannot afford to lose our irrigated green belts by imposing the economic hardship of discharge permit requirements on all of our irrigators. We would like to request that you consider a DeMinimus waiver for the upper basin area of Nevada County until storm water is properly addressed for all properties in the foothills.

Respectfully yours,

Paul Boch,  
Agricultural Commissioner